

### **REMARKS**

This amendment is submitted in response to the Office Action dated July 6, 2006. Applicants have amended the claims to more completely recite and/or clarify key features of the invention and overcome the claim rejections. No new matter has been added, and the amendments place the claims in better condition for allowance. Applicants respectfully request entry of the amendments to the claims. The discussion/arguments provided below reference the claims in their amended form.

### **CLAIMS REJECTIONS UNDER 35 U.S.C. § 101**

At section 2 of the Office Action, Examiner rejects Claims 1-35 under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants disagree with Examiner's characterization of Applicants Claim 1 and 31 (and other independent claims as non-statutory). Claims 1 and 31, which are method claims, are written in a claim format that is standard for a statutory method claim. The functionality provided by both claims is evident from reading the claim elements, given the teachings within Applicants' specification. Nonetheless, Applicants have amended the claims to more squarely place all claims within the parameters of statutory subject matter. The amendments overcome the §101 rejection, and Applicants respectfully request entry of the amendments and removal of the §101 rejection.

### **CLAIMS REJECTIONS UNDER 35 U.S.C. § 112**

At section 1 of the Office Action, Claims 3-4, 14-15, 17, 20, 23-24 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Applicants have amended the relevant claims to recite all elements in more definite form. The amendment overcomes the §112 rejection, and Applicants respectfully request reconsideration of the rejection in light of the amendment.

### CLAIM REJECTIONS UNDER 35 U.S.C. § 103

In section 3 of the present Office Action, Claims 1-35 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Allam* (U.S. Publication No. 2004/0139400 A1). Applicants' have included herewith an Affidavit filed under 37 C.F.R. §1.131, clearly evidencing the completion of the claimed invention at a time preceding the filing date attributable to the relevant, cited sections of *Allam*. That is, while *Allam* references a related provisional patent (the '803 Provisional), filed on October 23, 2002, the '803 Provisional contains no teaching or suggestion of the specific content of the later filed application (*Allam*) that is being relied upon by Examiner to support the present §103 rejections.

Applicants' claimed invention provides a method and system for automatically providing bibliographical information with copied content that is provided within an electronic document. As stated within the specification (para. 0007) and recited by the claims, the invention provides that:

*"When a person accesses the web page and copies content from the site, the bibliographical information is automatically appended to the copied content. If that content is then pasted into a different document, e.g., within a word processing application, the bibliographical information is automatically transferred to a location for such information within the document. This location may be in the footnotes section of that page and/or at the end of the document. Similarly, if the selected content is saved to a location, the bibliographical information is stored along with the content. In this way, automatic transfer of the bibliographical information occurs without requiring additional efforts by the copier."*

(see Claims 1, 2, *etal.*). Applicants' invention also provides that: "[i]n one embodiment, the pasted content is tagged with a footnote styled symbol indicating the identifier (ID) of the bibliographical information associated with the content. Also, clicking on the ID may take ... directly to the correct bibliographical information" (see para 0008; Claim 4, *etal.*). Further, Applicants' invention provides that: "when absolute copyright restrictions are provided along with the content, a user is prevented from completely removing all bibliographical information from within the document on the word processing editor unless the content is deleted" (see para 0008; Claim 6, 7, *etal.*).

The specific sections of *Allam* relied upon to support the rejection of the above features of Applicants' invention were first presented with the filing of *Allam* on October 22, 2003. None

of the relevant sections of *Allam* that are cited by the Examiner was disclosed or suggested within the '803 Provisional. The '803 Provisional provides overlapping content with *Allam* only up to paragraph 0081 (and several claims). All paragraphs following paragraph 0081 (and specifically paragraphs 0283-0286) of *Allam* were not presented within the '803 Provisional. Any content described within these later paragraphs thus has a priority date of October 22, 2003, which is the filing date of *Allam*. The disclosure/content within those paragraphs is therefore predated by Applicants' invention date, which is shown by the § 131 Affidavit to be at least as early as April 11, 2003.

*Allam* is therefore not a valid 103 reference, and *Allam* cannot be utilized to support a rejection of Applicants' claimed invention. Applicants' claims are therefore allowable over *Allam*.

However, assuming arguendo, that *Allam* was in fact a valid reference, with a filing date that predated Applicants' invention, *Allam* still does not suggest the subject matter provided by several of Applicants' claims, and therefore, *Allam* does not render Applicants' claims unpatentable. For example, *Allam* is devoid of any teaching or suggestion of (a) associating a citation identifier (ID) with the content, where the ID allows the bibliographical information to be displayed on selection of the ID by a user. The section of *Allam* provided to support the rejection of this feature (namely page 12, para 0139) provides a description of identifying or tagging annotations. One skilled in the art appreciates the inherent distinction between that teaching and the use of a citation identifier that enables the specific automatic display functionality, as described within Applicants' claims. Given the inherent distinctions, one skilled in the art would not find Applicants' claimed subject matter to be suggested by this reference within *Allam*.

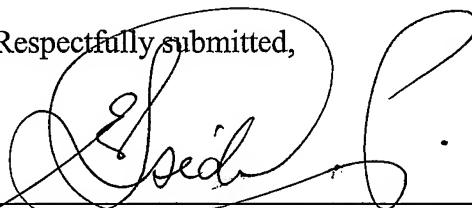
As another example, *Allam* does not suggest (b) disabling an option for deleting/removing the citation associated with specific content and/or (c) automatically deleting that content when the bibliographical information is deleted. Other claimed features of Applicants' invention are also not suggested by *Allam* and thus *Allam* does not render Applicants' claims obvious. Applicants' claims are therefore allowable.

### CONCLUSION

Applicants have diligently responded to the Office Action by amending the claims to overcome §101 and §112 rejections and to clarify features within specific claims. Applicants have further provided a §131 Affidavit and supporting §132 Affidavit evidencing Applicants' invention of the claimed subject matter prior to the filing date of *Allam*. Since the amendments overcome the §101 and §112 rejections and the §131 Affidavit renders the § 103 rejections moot, Applicants, respectfully request issuance of a Notice of Allowance for all claims now pending.

Applicants further respectfully request the Examiner contact the undersigned attorney of record at 512.343.6116 if such would further or expedite the prosecution of the present Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. Isidore', is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

Eustace P. Isidore  
Reg. No. 56,104  
Dillon & Yudell LLP  
8911 North Capital of Texas Highway  
Suite 2110  
Austin, Texas 78759  
512.343.6116

ATTORNEY FOR APPLICANT(S)